Procter&Gamble
The Procter & Gamble Paper Products Company
5000 North Iowa String Road
Bear River City, UT 84301

October 24, 2013

Public Comment
Utah Division of Air Quality
PO Box 144820
Salt Lake City, Utah 84114-4820

Re: $PM_{2.5}$ State Implementation Plan (SIP) Comments
The Procter & Gamble Paper Products Company, Box Elder County Facility

Dear Sir/Madam:

Via this letter, The Procter & Gamble Paper Products Company (P&G) is submitting comments on the draft Utah PM2.5 State Implementation Plan (SIP) issued by the Utah Department of Environmental Quality (UDEQ) Division for Air Quality on October 1, 2013. Please note that our comments are limited to the RACT documentation specific to our facility in Section 5.c.iii) RACT/RACM Evaluation Reports.

General Comment

The official company name for P&G is "The Procter & Gamble Paper Products Company," not "Proctor and Gamble." In addition, please note that Procter is spelled with an "e." This correction was previously brought to your attention over a year ago, but unfortunately, the error was not corrected and now has been propagated throughout all SIP documents. Please revise all SIP and other UDEQ air permit databases to reflect the official company name and spelling.

Technical Support Document (TSD) RACT Analysis

Enclosed are markups to the P&G TSD RACT analysis found in TSD Section 5.c.xxix. The mark-ups provide additional clarity to the reader. Most importantly, the potential-to-emit emissions tables found in Section 2.1 were revised to reflect the correct emission distribution among the major equipment areas.

Thank you for consideration. Please do not hesitate to contact me at ball.ja.1@pg.com or (435) 279-1442 if you have any questions or need additional information.

Respectfully Submitted,
The Procter & Gamble Paper Products Company

Joe Tomon
Box Elder Plant Manager

Encl. Mark-up of TSD P and G Cover pages for the RACT analysis – TSD Section 5.c.xxix

RACT Evaluation Report – Procter and Gamble Paper Products Company

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Wasatch Front PM2.5 SIP RACT

Wasatch Front Nonattainment Area

Utah Division of Air Quality
Major New Source Review Section
October 1, 2013

RACT EVALUATION REPORT
PROCTER AND GAMBLE PAPER PRODUCTS COMPANY

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1.1 INTRODUCTION AND FACILITY DESCRIPTION

1.2 Procter and Gamble Paper Products Company Facility Identification

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Name: Procter and Gamble Paper Products Company
Address: 5000 North Iowa String Road
Bear River City, Utah 84301
UTM coordinates: 402,500 meters Easting, 4,605,600 meters Northing, UTM Zone 12
SIC Code: 2676 (Sanitary Paper Products)
Owner/Operator: Procter and Gamble Paper Products Company (P&G)

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The plant is located in Box Elder County, Utah approximately 3 miles west of Bear River City bounded by Iowa String Road on the west, Wakegan Road on the east, and 4800 N. Road on the south. The site is approximately 10 miles northwest of Brigham City, Utah.

1.3 Facility Process Summary

The facility manufactures sanitary paper products for consumer use including paper towels and tissue paper. The facility AO includes two process lines, each containing a paper machine, boilers, and a converting room.

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Paper Machine

The facility paper machine utilizes pulp and additives as raw materials and produces large paper rolls that are further processed and converted into final product in the converting room. The papermaking process at the facility consists of three stages. Stock preparation is the first stage, which consists of mixing pulp, additives, and water (and recycled pulp). In the second stage, the slurry is then fed to a former unit, where the sheet screening, formation of paper, and draining occurs. In the final stage the wet paper undergoes drying, where the wet paper web is passed through drying zones. The dried web exiting the dry end part of the paper machine is wound on large rolls for further processing in the converting area.

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Converting

In the converting area, the paper rolls from the papermaking area are unwound and converted into the final product. The product is rerolled onto cores, printed, and packaged according to specifications. Finished products are sent to the distribution center for storage and/or shipping. Any scrap paper generated during the papermaking and converting operations is sent to the stock preparation area of the paper machines for reuse.

Utilities

The facility operates two natural gas boilers (per process line), each rated at 60.243 MMBtu/hr input, that provide process steam for the papermaking process. The paper machine uses natural gas-fired drying equipment with a total heat input capacity of 150 MMBtu/hr (each line). Other equipment at the plant includes one emergency generator, two fire pumps, and other equipment common to a typical industrial manufacturing facility.

Space Heaters

The facility buildings include several direct-fired natural gas space heaters with a total installed capacity of 57.05 MMBtu/hr. With the exception of the two paper machine room make-up air units, all space heaters at the facility have a rated capacity of less than 10 MMBtu/hr. The paper machine make-up air Unit 1 is equipped with one burner rated at 15.75 MMBtu/hr and Unit 2 is equipped with two burners each rated at 15.75 MMBtu/hr.

1.4 Facility Criteria Air Pollutant Emissions Sources

The facility consists of two process lines (containing a paper machine, boilers, and a converting room) and support equipment (containing space heaters, emergency equipment, and tanks).

A process line paper machine has six emission points associated with the unit. The six points are the Wet Exhaust Stack (PM_{10}), Process Stack (PM_{10}), Process Stack Combustion ($PM_{10}/PM_{2.5}$ and NOx), Under Dryer Stack (PM_{10}), Dry End Stack (PM_{10}) and Roof Exhaust (PM_{10}). Each point has its own RACT analysis.

The process line boilers have only one emissions point (for each boiler) which releases combustion emissions to the atmosphere.

A process line converting room contains machinery with no emissions or with fugitive emissions inside a large building with one point to control.

The support equipment consists of space heaters, emergency fire pump engines, emergency power generators and multiple storage tanks for onsite fuels and material storage.

Space heaters located at the facility operate on natural gas and use steam coils and have combustion byproducts of NOx, CO and very small amounts of VOC and $PM_{2.5}$. Due to the size of the heaters (less than 10 MMBtu/hr) and the use of clean fuel (natural gas), this RACT analysis is not going to address the space heaters due to the size of the heaters and the amount of emissions associated with them.

Emergency fire pumps engines are located at the facility and are only used in case of fire or some other event requiring their use. The pumps engines have a permit limitation 100 hours of operation per year (each) for testing and maintenance. The fire pumps engines are operated on diesel fuel and have combustion emissions (NOx, CO and very small amounts of VOC and $PM_{2.5}$). Due to the size and the amount of emissions associated with the fire pumps engines, this RACT analysis is not going to address the units.

Emergency power generator engines located at the facility are only used when line power is interrupted. The power generator engines have a permit limitation 100 hours of operation per year (each) for testing and maintenance. The power generator engines are operated on diesel fuel and have combustion emissions (NOx, CO and very small amounts of VOC and $PM_{2.5}$). Due to the size and the amount of emissions associated with power generator engines, this RACT analysis is not going to address the units.

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Storage Tanks located at this facility contain process materials; fuel storage, raw pulp,...etc. The emissions associated with these units are small and this RACT analysis is not addressing these units.

1.5 RACT Cut-off Threshold

All units/operations that are below 5 tons per year for any criteria pollutant were not analyzed for RACT.

2.1 RACT Evaluation

The RACT analysis for the Box Elder Facility is conducted for $PM_{2.5}$, NOX and VOC. Sulfur oxides are not taken into consideration because the facility is operated on natural gas and sulfur content is restricted in the gas quality supplied by Questar. Because the paper machine and the converting room are equipped with multiple stacks, the RACT analysis is conducted on a per stack basis. The RACT analysis will be conducted on a single line process, as both lines are identical in design but only one is constructed at this time. The support equipment (space heaters, emergency fire pump engines, emergency power generators and storage tanks) are not being analyzed in this evaluation. The emergency generator and emergency fire pump engines at the facility have a heat input capacity of less than 10 MMBtu/hr each and the emissions from the storage tanks are less than 5 tons per year of VOC's.

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The paper machine has the following stacks that will be addressed; wet exhaust stack, process stack, under dryer stack, dry end stack and the roof exhaust. The following are the annual maximum potential-to-emit associated with each point in tpy.

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Paper Machine (Each)	$PM_{10}/_{2.5}$	NOx	VOC
Wet Exhaust Stack	4.82	0.00	0.00
Process Stack	29.13	59.13	13.14
Under Dryer Stack	5.26	0.00	0.00

Dry End Stack	5.48	0.00	0.00
Roof Exhaust	7.29	12.42	72.47

The converting room will be addressed as one stack but the room is an open building and has high volume of air for the open space and low concentration of pollutants. The following are the PTEs associated with converting room in tons per year.

Converting Room (Each)	**$PM_{10}/_{2.5}$**	**NOx**	**VOC**
	8.26	0.29	11.48

Each boiler for the one process line has one stack. The following are the PTEs associated with two boilers in tpy.

Boilers for Each Paper Machine	**$PM_{10}/_{2.5}$**	**NOx**	**VOC**
Boiler 1	1.85	14.51	1.32
Boiler 2	1.85	14.51	1.32

The PM10/2.5 emission data above do not include condensable emissions.

2.2 Emission Source and Existing Controls

The facility RACT analysis is evaluating the paper machine's stacks, the two boilers, and the converting room. The analysis utilizes all six evaluation criteria specified by Utah DAQ. The paper machine emission controls identified are consistent with the emissions controls contained in the United States Environmental Protection Agency's (USEPA's) (unpublished) data base of 2011 information collection request (ICR) responses from the pulp and paper industry.

Paper Machine Available Control Technology

$PM_{2.5}$ Emissions

The possible control technologies for $PM_{2.5}$ can be categorized as inherently lower-emitting processes/work practices that prevent emissions and add-on systems that reduce emissions before being discharged to the atmosphere. The lower-emitting processes are incorporated during the design phase of the equipment and cannot be added to the existing equipment without compromising its operational integrity. The add-on technologies for controlling $PM_{2.5}$ emissions include:

Electrostatic precipitators (ESP),
Fabric Filters, and
Venturi Scrubbers.

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NOx Emissions

The NO_X emission control options for combustion equipment include equipment design and configuration, use of clean-burning fuel, good combustion practices, and add-on control systems.

The technologies in these categories include:

Equipment Design and Configuration:

Low-NOX burners
Flue gas recirculation (FGR) Add-

on Controls:

Selective Non-Catalytic Reduction (SNCR)
Selective Catalytic Reduction (SCR)

The RACT analysis addresses all common control technologies identified for similar sized units in USEPA's RACT/BACT/LAER Clearinghouse (RBLC) database. Currently, a venturi scrubber is installed on the paper machine dry end stack, a cyclonic separator is installed on the paper machine wet end stack and the paper machine under dryer stack.

Technically Infeasible RACT Controls

The paper machine wet exhaust stack is controlled by a cyclonic separator and the dry end stack is controlled by a venturi scrubber. The $PM_{2.5}$ outlet concentration of the other two stacks and the roof exhausters is less than 0.0052 grains/acfm. This low outlet concentration is comparable to the concentrations of streams controlled by conventional particulate control systems, and therefore, qualifies as an inherently lower-emitting process.

The technical feasibility of additional controls for the paper machine stacks indicates that ESP technology is not technically feasible because of the unknown characteristics of the paper making particulates matter in the exhaust. No data regarding the resistivity and other flue gas characteristics are currently available for determining the technical feasibility of the ESP technology for paper making exhaust streams. A review of the on-line control technology database, RACT/BACT/LAER Clearinghouse (RBLC), which is maintained by the U. S. Environmental Protection Agency (EPA), indicates no paper making installations employ the ESP technology.

For the fabric filter technology, the key gas stream characteristics that require consideration are moisture and corrosively. The presence of moisture in the gas stream adversely affects the filtration capability of the fabric media. The moisture can also cause material failures due to corrosion. The baghouse unit and associated ductwork must be insulated and possibly heated if the gas stream contains moisture. Both the

structural and fabric components may be damaged due to moisture and corrosiveness of the gas stream. Additionally, the temperature of the pollutant stream to be filtered must remain above the dew point of any condensable matter in the stream.

The paper machine stack exhaust streams contain a significant amount of moisture because the function of these streams is to remove moisture contained in the paper web. There are no known baghouse applications for controlling paper making stacks. Because of lack of technical data, operating experience, and potential moisture issues, baghouses are not technically feasible for controlling paper machine emissions.

Although a venturi scrubber is employed for controlling paper machine dry end $PM_{2.5}$ emissions, its effectiveness for other stacks is questionable due to the very low $PM_{2.5}$ concentration of the exhaust streams. Although questionable, venturi scrubber technology may be the only add-on technology that can be potentially technical feasible for the paper machine stacks.

The design and $PM_{2.5}$ emission control configuration of the facility paper machine is very similar to the paper machines at P&G's Cape Girardeau, Missouri, and Green Bay, Wisconsin plants. The Cape Girardeau and Green Bay paper machines have undergone a New Source Review Prevention of Significant Deterioration (PSD) review which included a BACT demonstration for PM_{10}. Because $PM_{2.5}$ is a subset of PM_{10} and controls employed for PM_{10} and $PM_{2.5}$ are similar, the BACT demonstration for PM_{10} also applies to $PM_{2.5}$.

Evaluation and Ranking of Technically Feasible RACT Controls

Cyclonic Seperators have been installed and are operating on the paper machines wet exhaust stack and under dryer stack to control $PM_{2.5}$ emissions. A venturi scrubber has been installed on the paper machine's dry end stack to control $PM_{2.5}$ emissions.

Selection of RACT controls

A cost analysis for the installation and operation of a venturi scrubber on each stack related to the paper machine was conducted. The installation of a venturi scrubber is only cost effective for the dry end stack. This control has already been installed on the dry end stack at the Box Elder facility. The cost analysis is in agreement with similarly scoped projects listed in the RBLC database. While there could be some variability in the annualized cost estimates for scrubbers, it is noted that such variability would make no difference in the conclusion that scrubbers are not cost-effective for the $PM_{2.5}$ emissions reductions at any other point on the paper machine.

Converting Room Available Control Technology

The converting room is equipped with drum filters that provide $PM_{2.5}$ control. The technical feasibility of additional controls for the converting room stack indicates that ESP technology is not technically feasible because of the unknown characteristics of

converting room exhaust specifically the particulate matter resistivity and possible moisture in the exhaust. No data regarding the resistivity and other flue gas characteristics are currently available for determining the technical feasibility of the ESP technology for paper making exhaust streams. A review of the on-line control technology database, RACT/BACT/LAER Clearinghouse (RBLC), which is maintained by the U. S. EPA, includes no control technology data for sources similar to converting lines.

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Comment [YMS1]: RBLC does not have converting lines.

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For the fabric filter technology, the key gas stream characteristics that require consideration are moisture and corrosivity. The presence of moisture in the gas stream adversely affects the filtration capability of the fabric media. The moisture can also cause material failures due to corrosion. The baghouse unit and associated ductwork must be insulated and possibly heated if the gas stream contains moisture. Both the structural and fabric components may be damaged due to moisture and corrosiveness of the gas stream. Additionally, the temperature of the pollutant stream to be filtered must remain above the dew point of any condensable matter in the stream.

The technical feasibility of the venture scrubber technology is also questionable due to the very low $PM_{2.5}$ concentration of the exhaust converting room exhaust streams.

Evaluation and Ranking of Technically Feasible RACT Controls

A drum filter has been installed to control $PM_{2.5}$ and is considered RACT.

Selection of RACT controls

A cost analysis for the installation and operation of a venturi scrubber on the converting room stack was conducted. The costs analysis was within reason based on other sources cost analysis and showed that the addition of venturi scrubber would not be cost effective when a drum filter is currently installed. While there could be some variability in the annualized cost estimates for scrubbers, it is noted that such variability would make no difference in the conclusion that scrubbers are not cost-effective for the $PM_{2.5}$ emissions reductions that would be achieved.

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Comment [YMS2]: RBLC does not contain control technology data for sources similar to converting lines.

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Boilers Available Control Technology

Boilers 1 and 2 fire natural gas, a clean burning fuel, and emit very small quantities of $PM_{2.5}$. No additional $PM_{2.5}$ controls can be applied to these boilers because of the extremely small $PM_{2.5}$ concentration (<0.00052 grains/acfm) of the exhaust streams.

Evaluation and Ranking of Technically Feasible RACT Controls

Due to the amount of $PM_{2.5}$ emissions from the boilers, an evaluation was conducted, and NG combustion, burner design and regular maintenance are RACT.

Comment [YMS3]: 2011 actual emissions; this has not been discussed before and has no relevance, therefore, should be deleted.

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Selection of RACT controls

The burner design, firing of natural gas, and regular maintenance collectively constitute RACT

NOx Emissions

Paper Machine Available Control Technology

The paper machine process stack emits NO_X resulting from the combustion of natural gas in the paper machine burners. The paper machine burners are low-NO_X burners with a design NO_X emission factor of 0.09 lb/MMBtu. The burners employ good combustion practices and work practice measures for minimizing emissions. The elements of these measures include:

Control of combustion temperature
Optimum excess air operation
Burner tuning
Monitoring of combustion system parameters for optimizing combustion process

Control of combustion temperature and optimum excess air operation contribute towards the reduction of thermal NO_X by continuously maintaining the combustion zone temperatures at optimum levels. Burner tuning and maintenance at regular intervals contribute to superior ongoing emissions performance. The in-place operating and management systems at the plant ensure an emission-efficient performance of the paper machine burners. Instrumentation and controls, which continuously monitor the burner operating conditions, allow detection of any abnormal operating conditions affecting the emission performance of the burners.

In addition to the combustion control measures identified above, the Box Elder Plant employs work practice measures consisting of operator training and routine equipment maintenance practices. These in-place work practice measures complement the combustion control measures and contribute towards minimizing the NO_X emissions.

The burner design and operational strategy discussed above represent the most energy efficient option for providing drying heat required by the paper making process. The paper machine drying configuration has been in operation at other P&G plants and has been accepted as BACT by the regulatory agencies. No other alternative systems or controls provide comparable energy and emission performance.

Add-on controls such as SNCR and SCR are not technically feasible for the paper machine process stack because SNCR requires injection of urea in the combustion zone which is not acceptable for the product quality reasons. These technologies are also not technically feasible because of the low NO_X concentration of the process stack exhaust stream.

A review of the RBLC database did not indicate any installations similar to the Box Elder paper machine. P&G's Cape Girardeau, Missouri Plant and Green Bay, Wisconsin Plant have installed new paper machines during the last 10 years. The emission factors for the paper machines at these plants are identical to those for the Box Elder Plant paper machine burners. The Cape Girardeau and Green Bay projects were subject to PSD review requirements and their NO_X emission factors were approved as Best Available Control Technology (BACT).

Selection of RACT controls

The paper machine dryer burners are low NOx burners. The use of low NOx burners and good combustion practices control the NOx emissions (which feed into the process stack) from this unit.

Boilers Available Control Technology

The Box Elder Facility boilers are designed for natural gas firing and are equipped with low-NO_X burners and incorporate flue gas recirculation FGR technology. These features collectively minimize NO_X emissions. No add-on controls have been determined to be applicable for natural gas boilers similar in size to the Box Elder Facility boilers. The application of SNCR and SCR technologies are mainly limited to boilers greater than 250 MMBtu/hr heat input firing solid fuels.

SNCR is technically not feasible for the Box Elder boilers for several reasons. In a typical SNCR system, urea is injected in the boiler furnace where it reacts with NO_X. The optimum temperature range for effective NO_X control is 1600 °F – 1800 °F. The uncontrolled NO_X concentration must be greater than 30 ppm to achieve any reduction of NO_X emissions. The SNCR also results in byproduct emissions of nitrous oxide (N_2O), a greenhouse gas (GHG) pollutant.

The SCR technology experience is also limited to utility boilers with heat input capacities greater than 250 MMBtu/hr heat input. There are no known SCR applications for boilers similar to Box Elder Facility boilers.

The above discussions indicate that because the NO_X concentration of boiler exhaust stream is less than 30 ppm and because the add on controls require modification of boiler furnace, no technically feasible add-on controls for NO_X are applicable to the Box Elder Facility boilers.

Evaluation and Ranking of Technically Feasible RACT Controls

For boilers that are less than 250 MMBTU/hr heat input firing, low-NOx burners and FGR technology is RACT.

Selection of RACT controls

The two boilers have low NOx burners and flue gas recirculation installed and operating on both boilers. The use of low NOx burners and flue gas recirculation control the NOx emissions from each boiler down to below 2 tons per year each. Low NOx burners and FGR control is RACT for these units. The Box Elder facility already has low NOx burners and FGR installed and operating on the boilers.

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Paper Machine Room Space Heating Available Control Technology

The paper machine room air handling units include three direct-fired natural gas burners, with a heat input rating of 15.75 MMBtu/hr each. The burners are an integral part of the air handling units that are supplied by the manufacturer as "off-the-shelf" systems and cannot be modified. Use of natural gas, a clean burning fuel, minimizes the air emissions. Additionally, performing periodic maintenance per manufacturer recommendations minimizes emissions, ensuring that the burners are in a good operating state.

No add-on controls are technically feasible for the space heating equipment and P&G is not aware of any space heating equipment employing add-on controls for NO_X emissions.

Evaluation and Ranking of Technically Feasible RACT Controls

The paper machine burners are an integral part of the air handling units that are supplied by the manufacturer as "off-the-shelf" systems and cannot be modified to add on control systems. Use of natural gas, a clean burning fuel, minimizes the air emissions.

Selection of RACT controls

The burner design, firing of natural gas, and regular maintenance collectively constitute RACT.

VOC Emissions

Paper Machine Available Control Technology

The paper machine air handling unit house three burners totaling 47.25 MMBtu/hr. Paper machine natural gas-fired dryer burners have emissions of nearly 12 tons/yr of VOC. The burners are integral components within the larger air handling units. The systems are manufactured as "off-the shelf" systems and cannot be modified with add on control technology. The RBLC database does not identify any add on control for space heaters of this type. As such, RACT would be good combustion practice and use of natural gas, which is already in practice at the Box Elder facility for the air handling units.

Evaluation and Ranking of Technically Feasible RACT Controls

The paper machine burners are an integral part of the air handling units that are supplied by the manufacturer as "off-the-shelf" systems and cannot be modified to add on control systems. Use of natural gas, a clean burning fuel, minimizes the air emissions.

Selection of RACT controls

The burner design, firing of natural gas, and regular maintenance collectively constitute RACT.

Converting Room Available Control Technology

The converting room has 150 tons per year of VOC emissions generated over a large area of the building and, as such, the concentration of VOC per volume of flow area in the building makes the capture and control of these VOC emissions infeasible. Emissions of VOC from these sources are minimized by the use of low-VOC materials.

Evaluation and Ranking of Technically Feasible RACT Controls

The VOC emissions are generated over a large open area inside a building and, as such, the concentration of VOC per volume of flow area in the building makes the capture and control of these VOC emissions infeasible.

Selection of RACT controls

P&G's uses low VOC materials that is BACT for papermaking and converting equipment fugitives therefore acceptable as RACT.

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3.0 Summary of RACT Analysis and Conclusions

The State of Utah has reviewed P&G operations/equipment and has determined that P&G is meeting RACT. The RACT analysis in this document demonstrates that the P&G air emission sources are designed, equipped with technically feasible controls, and employ good operating practices to minimize air emissions. This operating strategy for the emission units minimizes emissions and constitutes RACT.

P&G's initial air permit application for AO DAQE-AN0141070001-08 included a BACT evaluation and demonstrated that the emission units at the plant employ BACT, which are considered to be more stringent than RACT.

Comment [YMS4]: This discussion is not relevant to RACT review in this document. Please see the suggested text.

Deleted: P&G is subject to the following federal requirements; 40 CFR 60 Subpart A- General Provisions, 40 CFR 60 Subpart Dc-Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR 63 Subpart A-General Provisions, and 40 CFR 63 Subpart ZZZZ-NESHAPs for Stationary Reciprocating Internal Combustion Engines. P&G also has a Title V permit which holds all conditions (state and federal) with the subsequent monitoring, reporting and recordkeeping requirements.